

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

MEMORANDUM

6/16/2017

SUBJECT: Product Chemistry Review for **Ultra Palmolive Antibacterial Dish Liquid**
EPA Reg. No. **4582-72**; DP **440688**

FROM: Sergey Alekseyev, Chemist
Product Science Branch, CTT

Sergey Alekseyev *Karen Hicks*

Registrant: Colgate-Palmolive Company

Action code: (362) Formula Change;
Technical;

Agency Due Date: 07/07/2017

THROUGH: Karen Hicks, Team Leader
Product Science Branch
Antimicrobials Division (7510P)

Submission No. 1003950
98347820

Formulation: EUP

TO: Jacqueline Hardy/Imad Merveil
PM Team 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

Pesticide classification: antibacterial

MRID(s):

PC Code	CAS No.	Name	% by wt.
128929	79-33-4	L-Lactic acid (L-(+)-alpha-Hydroxypropionic acid)	2.00
		Inerts	98.00

I. BACKGROUND

The registrant, Colgate-Palmolive Company, requested adding the alternate formulation # 28 CSF, dated 05/22/2017.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-27 – Formulator's Exemption Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-34 – Certification with respect to citation of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5/22	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cover letter (5/23/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSFs (the alternate formulation #28, dated 05/22/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED:	--	

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Active Ingredients(s)	Nominal	Upper limit	Lower limit
L-Lactic acid (L-(+)-alpha-Hydroxypropionic acid)	2.00	2.10	1.8
	YES	NO	N/A
1. The certified limits of the active ingredients are within 40 CFR standard certified limits.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. All inert ingredients are approved for food use pesticide formulations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	YES	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

V. Additional Finding

1. The proposed CSF is essentially similar to the CSF (alternate #17, dated 08/08/2011), approved by EPA, see the letter, dated 05/23/2017. The only difference between said CSFs is that the concentration of colorant and fragrance is lesser for the proposed CSF than this in the alternate #17 CSF.

2. The value of the lower certified limit for the active ingredient disagrees with that in 40 CFR §158.350. This value has been approved for the alternate formulation #17 CSF, dated 08/08/2011.

V. Conclusion

The registrant has satisfied the alternate formulation #28, dated 05/22/2017, formulation CSF requirements for registration of EPA Reg. No. **4582-72**.